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December 27, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: GN Docket No. 17-258

Amplex Electric, Inc. provides broadband service to over 7000 locations in Lucas, Ottawa, Hancock, Sandusky, Seneca, and Wood County, Ohio. We provide advanced broadband service to rural and suburban residential and business customers using fixed wireless service. Amplex competes for customers with other fixed wireless providers, cable companies, mobile, and government subsidized phone companies. We have grown our company by providing excellent customer service and delivering value to our customers. Our success in providing both competition and availability in rural markets is proof that profitable advanced rural broadband can be delivered in rural areas with a combination of local knowledge, hard work, and available spectrum. The 3650-3700Mhz band has been essential to reliably delivering service to a significant portion (24%) of our customers. CBRS spectrum will be essential to continuing to serve existing customers and expanding service to new customers.

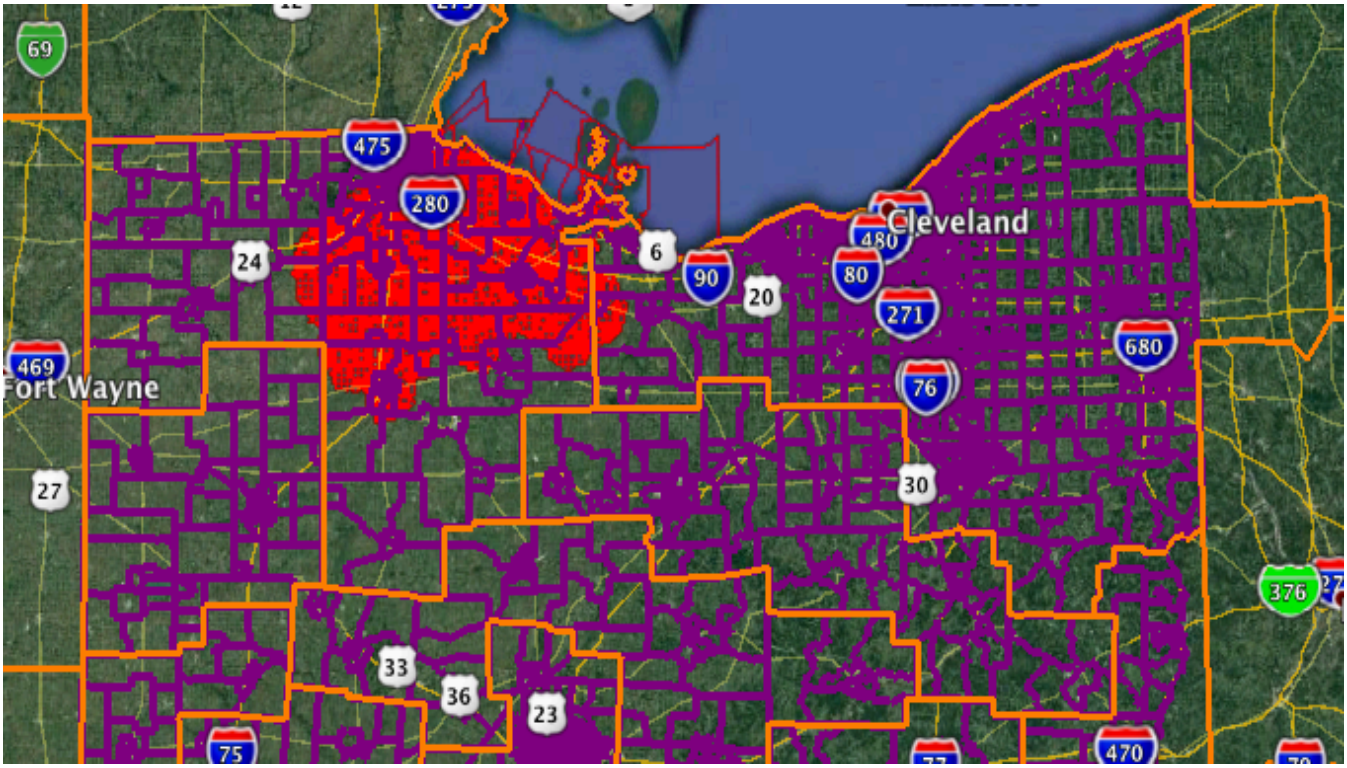
In many areas Amplex is using all available 3650-3700Mhz spectrum and intends to utilize a combination of GAA and PAL CBRS spectrum. Our entire existing Cambium deployment in the 3.6 band has been purchased and installed in reliance of the rules the FCC adopted in 2012 and confirmed in 2015. The equipment purchased over the last 5 years is fully capable of operating under the CBRS rules as they are currently enacted. The FCC risks stranding significant investment and impairing competitive service to many locations by making significant changes to the 2015 rules.

Since the announcement in early 2017 that the FCC was considering changing the CBRS rules adopted in 2015 Amplex has significantly scaled back our investment in CBRS capable equipment due to the uncertainty over the regulatory environment and the potential lack of availability of PAL's. Amplex has installed or upgraded multiple tower sites in 2017, but we have not deployed CBRS band equipment at these sites. Installation of CBRS band equipment would allow us to serve customers that we are unable to provide satisfactory service to using other available spectrum. Prior to the proposed NPRM, Amplex had been conducting trials with BaiCells LTE equipment in 3.65 with promising results. Pending the resolution of this NPRM, Amplex has halted additional trials of LTE gear.

Amplex fully supports the comments of the Wireless Internet Service Providers Association (WISPA) in this proceeding. This filing adds additional information on the risk to broadband service in N.W. Ohio by increasing the PAL size to PEA's and allowing essentially permanent license renewals.

The following map shows northern Ohio with the orange lines representing PEA's, the purple representing census tracts, and the red showing Amplex's FCC 477 reported coverage as of June 2017. To obtain PAL spectrum to cover our current needs would require purchasing the Toledo, OH PEA (61) and the Cleveland, OH PEA (14). Should we wish to expand coverage to rural areas to the south we would also need to consider the Lima and Mansfield PEA's. The Cleveland PEA is particularly ridiculous as it covers all of northeast Ohio and portions of Pennsylvania. The Cleveland PEA combines major metro markets with extremely rural areas. Amplex is interested in purchasing PAL's in 4 census tracts inside the Cleveland PEA to serve our existing customer base. Purchasing the other ~7,500 square miles of the

Cleveland PEA is cost prohibitive and makes sense only for a large mobile carrier seeking to restrict competition or as an investment vehicle.



Amplex Coverage area, PEA and census tract boundaries

Amplex does not need the PAL spectrum in the western half of Ohio as that area is well served by other WISP's. The same situation applies to the southern portion of the area. Amplex has no interest in the urban Toledo areas as this area is served by multiple cable and telephone operators. Money spent purchasing a PAL that encompasses areas that we have no interest in serving is wasted and not available for installing new or upgrading existing customers.

Amplex absolutely intends to participate in the PAL auctions assuming they stay at substantially the current size and term. Amplex will be bidding on tracts in Wood, Ottawa, Sandusky, Hancock, Seneca, and potentially Lucas counties. This is not an endorsement of counties as a PAL boundary – counties are simply used here for convenience.

The FCC asks if disaggregation and secondary markets is a suitable solution to the excessive size of the PEA's. Amplex does not believe disaggregation and secondary markets are acceptable. Disaggregation and secondary markets are not a solution to the problems the FCC creates by greatly increasing the PAL sizes and extended licensing terms.

Amplex opposes changing the size of the PAL's from the current census tract model. The current census tract PAL size is appropriate, reasonable, and in no way precludes it's use by mobile interests or others deploying 5G services. While the census tract model may be inconvenient for the mobile carriers, that is no justification for seriously and permanently impairing the spectrum by changing the allocation model to PEA's.

The FCC asks about license terms and proposes extending the term to 10 years and making them essentially permanent. Amplex opposes extending the license terms past 3 years. Amplex continuously adds new service territories as customer demand and funds permit. The census tract PAL size and 3 year license terms allows us to build and purchase a PAL when needed. If PAL's are only available every 10 years (or never with perpetual renewal) the result is a one-time high stakes auction. Competition is restricted to the PAL's as they exist at the time of the auction. With 10 year terms no new user, competitor, or use case can obtain a PAL when needed other than by obtaining it on a sublicensed basis. By making PAL's available every 3 years (or by having a 10Mhz PAL become available on average just over 5 months given the 36 month term and 7 PAL's) licensed spectrum is potentially always available with a short

waiting period and a sufficient bid. Long license terms make spectrum a financial investment rather than a form of infrastructure serving the public interest.

Several items in the FNPRM are acceptable and helpful. Permitting the auction of all seven PAL's in any given market and relaxing the emissions limits when aggregating channels are helpful improvements in the CBRS rules.

Sincerely,

Mark Radabaugh

Mark Radabaugh
President
Amplex Electric, Inc.